

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

HENRIETTA KLEIN, derivatively, on behalf of  
PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.  
ANTHONY BURNS, ROBERT N. BURT; W. DON  
CORNWELL, WILLIAM H. GRAY III,  
CONSTANCE J. HORNER, JAMES M. KILTS,  
JEFFREY B. KINDLER, GEORGE A. LORCH,  
DANA G. MEAD, SUZANNE NORA JOHNSON;  
STEPHEN W. SANGER; WILLIAM C. STEERE,  
JR., FRED A. C. LEWIS-HALL, FRANK A.  
D'AMELIO, and IAN READ,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

**C.A. No. 09-cv-7822-JSR**

**ECF CASE**

[caption continues on the following page]

**NOTICE OF MOTION OF AMALGAMATED BANK, AS TRUSTEE FOR  
LONGVIEW LARGE CAP 500 INDEX VEB FUND, LONGVIEW LARGE CAP  
500 INDEX FUND AND LONGVIEW QUANTITATIVE LARGE CAP FUND, FOR  
APPOINTMENT OF LEAD PLAINTIFF AND LEAD COUNSEL AND  
CONSOLIDATION OF RELATED ACTIONS**

JAMES KENNEY, derivatively, on behalf of  
PFIZER INC.,

Plaintiff,

v.

JEFFREY B. KINDLER, DOUGLAS M. LANKLER,  
DENNIS A. AUSIELLO, MICHAEL S. BROWN,  
ROBERT N. BURT, W. DON CORNWELL,  
CONSTANCE J. HORNER, JAMES M. KILTS, DANA  
G. MEAD; SUZANNE NORA JOHNSON, HENRY A.  
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.  
HOWELL, STANLEY O. IKENBERRY, FRANKLIN  
D. RAINES, RUTH J. SIMMONS, and JEAN PAUL  
VALLES,

Defendants,

and

PFIZER INC., a Delaware corporation,

Nominal Defendant.

**C.A. No. 09-cv-7913-JSR**

**ECF CASE**

ROBERT J. CASEY and WILLIAM A.  
HOUSTON, derivatively, on behalf of PFIZER  
INC.,

Plaintiffs,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.  
ANTHONY BURNS, ROBERT N. BURT, W. DON  
CORNWELL, WILLIAM H. GRAY III, CONSTANCE  
J. HORNER, JAMES M. KILTS, JEFFREY B.  
KINDLER, GEORGE A. LORCH, DANA G. MEAD,  
SUZANNE NORA JOHNSON, STEPHEN W.  
SANGER, WILLIAM C. STEERE, JR., FRED A. C.  
LEWIS-HALL, FRANK A. D'AMELIO and IAN C.  
READ,

Defendants,

and

PFIZER INC., a Delaware corporation,

Nominal Defendant.

**C.A. No. 09-cv-7983-JSR**

**ECF CASE**

LOUISIANA SHERIFFS' PENSION AND RELIEF  
FUND, derivatively, on behalf of PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.  
ANTHONY BURNS, ROBERT N. BURT, W. DON  
CORNWELL, WILLIAM H. GRAY III, CONSTANCE  
J. HORNER, JAMES M. KILTS, JEFFREY B.  
KINDLER, GEORGE A. LORCH, DANA G. MEAD,  
SUZANNE NORA JOHNSON, WILLIAM C.  
STEERE, JR., DOUGLAS M. LANKLER, FRANK.  
A. D'AMELIO, IAN C. READ, and JOSEPH M.  
FECZKO,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

**C.A. No. 09-cv-8042-JSR**

**ECF CASE**

CATHY BUCH,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.  
ANTHONY BURNS, ROBERT N. BURT, W. DON  
CORNWELL, WILLIAM H. GRAY III, CONSTANCE  
J. HORNER, JAMES M. KILTS, JEFFREY B.  
KINDLER, GEORGE A. LORCH, DANA G. MEAD,  
SUZANNE NORA JOHNSON, STEPHEN W.  
SANGER, WILLIAM C. STEERE, JR., DOUGLAS  
M. LANKLER, FRANK A. D'AMELIO, IAN C.  
READ, JOSEPH M. FECZKO, HENRY A.  
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.  
HOWELLSTANLEY O. IKENBERRY, FRANKLIN D.  
RAINES, RUTH J. SIMMONS, JEAN-PAUL  
VALLES, FREDA C. LEWIS-HALL, and PFIZER  
INC.,

Defendants.

**C.A. No. 09-cv-8289-JSR**

**ECF CASE**

AMALGAMATED BANK, AS TRUSTEE FOR  
LONGVIEW LARGE CAP 500 INDEX VEBA  
FUND, LONGVIEW LARGE CAP 500 INDEX  
FUND and LONGVIEW QUANTITATIVE  
LARGE CAP FUND, derivatively, on behalf of  
PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.  
ANTHONY BURNS, ROBERT N. BURT, W. DON  
CORNWELL, WILLIAM H. GRAY III, CONSTANCE  
J. HORNER, JAMES M. KILTS, JEFFREY B.  
KINDLER, GEORGE A. LORCH, DANA G. MEAD,  
SUZANNE NORA JOHNSON, WILLIAM C.  
STEERE, JR., WILLIAM R. HOWELL, HENRY A.  
MCKINNELL, STANLEY O. IKENBERRY, RUTH J.  
SIMMONS, DOUGLAS M. LANKLER, FRANK. A.  
D'AMELIO, IAN C. READ, and JOSEPH M.  
FECZKO,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

**C.A. No. 09-cv-8363-JSR**

**ECF CASE**

THE PORT AUTHORITY OF ALLEGHENY  
COUNTY RETIREMENT AND DISABILITY  
ALLOWANCE PLAN FOR EMPLOYEES  
REPRESENTED BY LOCAL 85 OF  
AMALGAMATED TRANSIT UNION,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.  
ANTHONY BURNS, ROBERT N. BURT, W. DON  
CORNWELL, WILLIAM H. GRAY III, CONSTANCE  
J. HORNER, JAMES M. KILTS, JEFFREY B.  
KINDLER, GEORGE A. LORCH, DANA G. MEAD,  
SUZANNE NORA JOHNSON, STEPHEN W.  
SANGER, WILLIAM C. STEERE, JR., DOUGLAS  
M. LANKLER, FRANK A. D'AMELIO, IAN C.  
READ, JOSEPH M. FECZKO, HENRY A.  
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.  
HOWELL, STANLEY O. IKENBERRY, FRANKLIN  
D. RAINES, RUTH J. SIMMONS, JEAN-PAUL  
VALLES, FRED A. LEWIS-HALL and PFIZER  
INC.,

Defendants.

**C.A. No. 09-cv-8388-JSR**

**ECF CASE**

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SKANDIA LIFE INSURANCE COMPANY LTD.,

Plaintiff,

v.

JEFFREY B. KINDLER, DENNIS A. AUSIELLO,  
MICHAEL S. BROWN, M. ANTHONY BURNS,  
ROBERT N. BURT, W. DON CORNWELL,  
WILLIAM H. GRAY III, CONSTANCE J. HORNER,  
WILLIAM R. HOWELL, STANLEY O. IKENBERRY,  
SUZANNE NORA JOHNSON, JAMES M. KILTS,  
GEORGE A. LORCH, HENRY A. MCKINNELL,  
DANA G. MEAD, FRANKLIN D. RAINES, DAVID L.  
SHEDLARZ, RUTH J. SIMMONS, WILLIAM C.  
STEERE, JR., JEAN-PAUL VALLES, FRANK A.  
D'AMELIO, JOSEPH M. FECZKO, DOUGLAS M.  
LANKLER, and IAN C. READ,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

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**C.A. No. 09-cv-8544-UA**

**ECF CASE**



PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Jed S. Rakoff, at the United States District Court for the Southern District of New York, located at the United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York, Amalgamated Bank, as Trustee for LongView Largecap 500 Index VEBA Fund, LongView Largecap 500 Index Fund and LongView Quantitative Largecap Fund (“Amalgamated”), will respectfully move this Court, for entry of an Order (i) appointing Amalgamated as Lead Plaintiff in the above-captioned actions, (ii) appointing its counsel, Bernstein Litowitz Berger & Grossmann LLP, as Lead Counsel, and (iii) consolidating all above-captioned derivative actions against current and former members of senior management and the Board of Directors of Pfizer Inc. (“Pfizer” or the “Company”) under Rule 42(a) of the Federal Rules of Civil Procedure.

Amalgamated respectfully submits that the above-captioned actions—which allege similar claims based on nearly identical conduct by current and former members of senior management and the Board of Directors of Pfizer—and any subsequently filed or transferred actions brought on behalf of nominal defendant Pfizer that arise out of the same or similar facts, should be consolidated pursuant to Rule 42(a) of the Federal Rules of Civil Procedure. Further, Amalgamated respectfully requests that it be appointed as Lead Plaintiff and its counsel, Bernstein Litowitz Berger & Grossmann LLP, appointed as Lead Counsel because they are best qualified to represent the interests of the Company in the consolidated action.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Gerald H. Silk filed herewith,

the pleadings and other files herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Amalgamated respectfully requests that the Court (i) consolidate all related derivative actions; (ii) appoint Amalgamated as Lead Plaintiff; (iii) appoint Amalgamated's counsel, Bernstein Litowitz Berger & Grossmann LLP, as Lead Counsel; and (iv) grant such other and further relief as the Court may deem just and proper.

Dated: October 8, 2009

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP**

/s/ Gerald H. Silk

Gerald H. Silk

Mark Lebovitch

Samuel J. Lieberman

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for LongView Largecap 500 Index VEBA  
Fund, LongView Largecap 500 Index Fund  
and LongView Quantitative Largecap Fund*